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December 27, 2023

Via ECF:

The Honorable Katharine H. Parker, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Ni v. HSBC Bank USA, N.A.*
Case No. 23-cv-00309-RA-KHP

Dear Judge Parker:

This firm represents Plaintiff in the above-referenced matter and writes jointly with Defendant in this matter. The deadline for fact discovery in the present Action is currently set for January 15, 2024. Since the Court set such deadline, the parties have filed two motions which will significantly affect the contours of this Action moving forward. Namely, on October 24, 2023, Plaintiff moved for conditional certification and on December 21, 2023, Defendant moved for summary judgment on all of Plaintiff's claims.

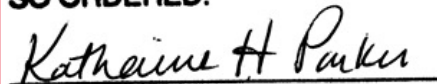
Given these motions, the parties write jointly, and consistent with the discussions held with the Court at the November 8, 2023, conference and further discussions held between the parties, to request that the January 15, 2024 fact discovery deadline be stayed with respect to discovery regarding the claims of putative collective and class members pending this Court's decision on collective certification. The parties further request that within two weeks of the decision on collective certification that the parties be permitted to submit a revised discovery schedule and plan.

We thank the Court for its consideration of the above.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

Request granted. The Fact Discovery deadline is stayed pending resolution of the Motion for Collective Class Certification at ECF No. 74. Parties shall have two weeks following resolution of the motion to submit a revised discovery plan.

SO ORDERED:


HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

12/28/2023